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November 9, 2011

NICKOLAI BOBROV, TREASURER CAMPAIGN FOR CHANGE 202 BONHAM RD. DEDHAM, MA 02026

**Response Due Date 12/14/2011** 

**IDENTIFICATION NUMBER: C00441501** 

REFERENCE: MID-YEAR REPORT (01/01/2011 - 06/30/2011)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 5 item(s):

- 1. Your filings disclose that your committee may have satisfied the criteria set forth at 11 CFR §100.5(e)(3) for becoming a multicandidate committee; however, the Commission has no record of a FORM 1M (Notification of Multicandidate Status) filed by your committee. Please be advised that once a political committee meets the certification requirements or becomes affiliated with an existing multicandidate committee, whether or not that political committee has certified its status as a multicandidate committee, it automatically attains multicandidate status and must file a FORM 1M (Notification of Multicandidate Status) within ten (10) calendar days. The certification requirements for multicandidate status have been satisfied when a political committee:
- 1 has received contributions for federal elections from at least 51 persons;
- 2 has been registered with the Commission for at least 6 months; and
- 3 has made contributions to at least five federal candidates.

For further guidance on the multicandidate certification requirements, please see 11 CFR §§102.2(a)(3), 110.2(a)(1) and (2). Please submit a FORM 1M to disclose the required information for the public record. A copy of FEC FORM 1M can be downloaded from the FEC website at <a href="http://www.fec.gov">http://www.fec.gov</a>, or requested through the FEC Fax line at (202) 501-3413.

2. Itemized disbursements must include a brief statement or description of why

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each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s): "Operational Expense," "Fees expense," "Fees expenses," and "Consulting expense." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at http://www.fec.gov/law/policy/purposeofdisbursement/inadequate\_purpose\_list 3507.pdf.

- **3.** On Schedule B of your report, you have disclosed disbursements to federal candidate committees. Commission regulations require that these itemized disbursements include the recipient's full name, complete address, date, amount, purpose, state, office sought (House, Senate, or President), and district (if applicable). Please amend your report to include the state, office sought, and district (if applicable). (11 CFR §104.3 (b)(3))
- **4.** Please be advised that only contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 29. (11 CFR §104.3 (b)(1))
- **5.** Schedule B supporting Line 23 of your report discloses contributions to several candidates designated for Primary 2011. However, Primary elections for Federal offices are not being held in these States/districts during 2011. Please amend your report to clarify the designated election year for these contributions

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any

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questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1177.

Sincerely,

**Brian Jones** 

Campaign Finance Analyst Reports Analysis Division

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